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December 17, 2012

VIA ECF

Honorable Lois Bloom
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Shirley Wrubel v. John Hancock Life Ins. Co.
Docket No. 11-cv-01873 (WFK) (LB)
Our File No. 4206.0002**

Dear Honorable Judge Bloom:

We represent the plaintiff in the above referenced matter. We write in response to the letter dated December 13, 2012 concerning Ms. Wrubel's birth certificate. On Friday, October 26, 2012, Your Honor ordered that Ms. Wrubel go to the Office of Vital Records to obtain her birth certificate. On Monday, October 29, 2012, Hurricane Sandy struck the region and forced the closure of offices in lower Manhattan, including the Office of Vital Records located at 125 Worth Street. In the ensuing days, Ms. Wrubel traveled twice to the office to find it closed. On November 15, 2012, she returned and applied for the birth certificate. When applying, Ms. Wrubel was given a list of options requesting the reason the birth certificate was needed. When she chose the option "legal," she was told that the long-form birth certificate would take two weeks to arrive and no other option was available.

Attached as Exhibit A is a copy of the receipt of her purchase of the birth certificate. The birth certificate arrived earlier today (Exhibit B) and we are making arrangements to have it personally delivered to Mr. Flanagan by the end of business hours today.

Respectfully submitted,

LIPSIUS-BENHAIM LAW, LLP

David BenHaim

DB:bl
Enclosures

EXHIBIT A

**Order Receipt**

Office of Vital Records - Cashiering
The City of New York
Department of Health & Mental Hygiene
Office of Vital Records

Order Number: 20121107166

Date: 11/15/2012 11:37:00AM

Applicant: shirley wrubel

Ship To:

shirley wrubel
198 wilson st
Brooklyn, NY 11211

Order Number: 20121107166

Date: 11/15/2012 11:37:00AM

Applicant: shirley wrubel

Payer: shirley wrubel
198 wilson st
Brooklyn, NY 11211

Payment Type: Credit Card

Qty	Service	Name	Delivery	Total Amount
1	Birth - Long Form	Shirley Rebecca Hollander	PICKUP	\$ 15.00
1	Birth - Long Form	shirley wrubel	PICKUP	\$ 15.00
-1	Birth - Long Form	shirley wrubel	PICKUP	\$-15.00
1	Non Refundable Security Fee			\$ 2.75
Sub-Total				\$ 17.75
Waived				\$ 0.00
Shipping & Handling				\$ 0.00
Due				\$ 17.75
Paid				\$ 32.75
Refund				\$-15.00
Balance				\$ 0.00



20121107166+

EXHIBIT B

CERTIFICATION OF BIRTH

This is a certification of name and birth facts on file in this Office of Vital Records, Department of Health and Mental Hygiene, City of New York.

DATE: JULY 01, 1961

REGISTRATION NO: 104-51-309-28

PLACE: BROOKLYN

DOB: 03-20-1961

DATE OF BIRTH: 12-14-2012

NAME: SHIRLEY REBECCA HOLLANDER

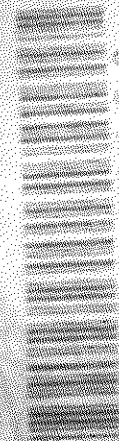
SEX: FEMALE

MOTHER'S NAME: SARAH F. HOLLANDER

FATHER'S NAME: JACOB HOLLANDER

Steven P. Schwab
Steven P. Schwab, M.D.
City Registrar

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The City of New York